

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 23-00117-MJC
Kimberly Ann Conahan	:	Chapter 13
Debtor	:	
	:	
U.S. Bank Trust National Association, not in its	:	
individual capacity but solely as owner trustee for	:	
RCAF Acquisition Trust	:	
Movant	:	
vs.	:	
Kimberly Ann Conahan	:	
Debtor/Respondent	:	
and	:	
Jack N. Zaharopoulos, Esquire	:	
Trustee/Respondent	:	

CERTIFICATION OF DEFAULT

AND NOW, comes secured Creditor, U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for RCAF Acquisition Trust (“Movant”) by and through its counsel, Hladik, Onorato & Federman, LLP, and files this Certification of Default to obtain an order for Relief from the Automatic Stay due to Debtor’s failure to comply with the terms of the Stipulation resolving a Motion for Relief from Stay, and avers the following:

1. On May 30, 2024, the attached Stipulation was approved by the Court. See Exhibit “A” attached.
2. Debtor did not continue to make the post-petition payments as required by the Stipulation. On July 12, 2024, Movant sent a Notice of Default to the Debtor and Debtor’s Counsel, as required by paragraph 5 of the Stipulation. Additionally, Debtor has failed to file the Amended Plan to cure the post-petition arrears set forth in the Stipulation. See Exhibit “B” attached.
3. Per the terms of the Stipulation if the default is not cured within ten (10) days of the date of the written notice of default, Movant may file a Certification of Default and an Order shall be entered granting Movant relief from the stay.
4. As of the date of the filing of this Certification of Default, more than ten (10) days have passed and the default has not been cured. Movant has not received the following payments:

May 1, 2024 through July 1, 2024	
(Regular Monthly Payment @ \$857.99 each).....	\$2,573.97
Attorney fees for Notice of Default.....	\$100.00
Attorney fees for Certification of Default.....	\$200.00
TOTAL.....	\$ 2,873.97

WHEREFORE, Movant respectfully requests this Honorable Court ORDER that Movant be granted Relief from the Automatic Stay.

Respectfully Submitted:

/s / Danielle Boyle-Ebersole, Esquire
 Danielle Boyle-Ebersole, Esquire
 Hladik, Onorato & Federman, LLP
 Attorney I.D. # 81747
 298 Wissahickon Avenue
 North Wales, PA 19454
 Phone 215-855-9521
 Email: dboyle-ebersole@hoflawgroup.com

Date: 07/31/2024